IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, *Plaintiff,* v. **MANUEL EUGENIO REYES-ROMÁN,** *Defendant*	**CRIM. NO. 16-400 (FAB)**

MOTION FOR EXTENSION OF TIME TO FILE RESTITUTION MEMORANDUM

TO THE HONORABLE COURT:

The **UNITED STATES OF AMERICA**, by and through the undersigned attorney, very respectfully states and prays as follows:

1. The sentencing hearing for the instant case was held on November 29, 2016, where the defendant was sentenced to 97 months of imprisonment in addition to ten (10) years of a term of supervised release and the corresponding special monetary assessment.

2. On that same day, the Court ordered the Government to file any request for restitution within the following 90 days, which would expire on February 27, 2017. (DE No. 41)

3. In order for the Government to be able to make the corresponding restitution request, it needed the NCMEC reports identifying the victims contained in the evidence of this case.

4. These reports were received on January 2017 and, with the provided information therein, a restitution assessment per victim needs to be calculated.

5. The undersigned was intensely immersed for the past four weeks in trial prep and eventually a jury trial, on case 15-440 (FAB), which concluded last Wednesday night, March 1, 2017.

6. As a result, it is very respectfully requested that an extension of time of 30 days be granted for the filing of the restitution memorandum in the instant case, which shall expire on Friday, March 30, 2017.

WHEREFORE, the United States of America respectfully requests from this Honorable Court to TAKE NOTICE of the aforementioned and GRANT the Government until March 30, 2017 to file the restitution memorandum.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of March, 2017.

ROSA EMILIA RODRIGUEZ-VÉLEZ
UNITED STATES ATTORNEY

/s/ Cristina Caraballo-Colón
Cristina Caraballo-Colón
Special Assistant United States Attorney
USDC-No. 300508
United States Attorney's Office
350 Carlos Chardón Ave., Suite 1201
San Juan, Puerto Rico 00918
Tel: (787) 766-5656
cristina.caraballo@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the defendant.

/s/ Cristina Caraballo-Colón
Cristina Caraballo-Colón
Special Assistant United States Attorney
USDC-No. 300508